

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

**08-CR-77
(Hon. Thomas J. McAvoy)**

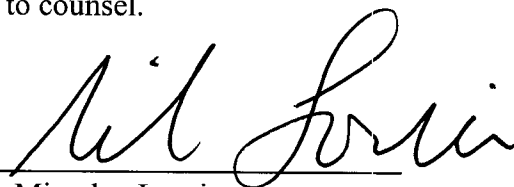
**DEAN SACCO,
LINDA O'CONNOR,**

Defendants.

GOVERNMENT'S DISCOVERY STATEMENT

The government respectfully furnishes to the Court this written notice of discovery materials provided to the defendants through their respective counsel, Lisa Peebles and Kelly Fischer. Attached to this statement is a copy of the summary letter sent to counsel in addition to and along with the discovery materials/documents sent to counsel.

Dated: March 10, 2008


By: Miroslav Lovric
Assistant U.S. Attorney
Federal Building
15 Henry Street
Binghamton, New York 13901
(607) 773-2887



*United States Attorney
Northern District of New York*

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March 10, 2008

Ms. Lisa Peebles, Esq.
Office of the Public Defender
The Clinton Exchange, 3rd Floor
4 Clinton Square
Syracuse, New York 13202

Mr. Kelly E. Fischer
Fischer, Fischer Law Firm
142 Front Street
Binghamton, New York 13905

Re: United States v. Dean Sacco & Linda O'Connor, [08-CR-77] (TJM)

Dear Ms. Peebles & Mr. Fischer:

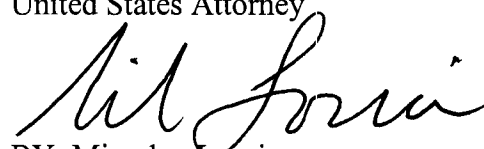
This letter memorializes and confirms copies of additional discovery materials which are hereby being mailed to your attention in connection to this case.

Enclosed you will find copies of the following materials and documents:

1. Copy of Best Western hotel records for Linda O'Connor.
2. Copy of Jersey City Police Department Investigation reports in connection with March of 2007 arrest of Dean Sacco.
3. Copy of defendant Dean Sacco's letter dated April 7, 2007 that defendant Sacco wrote and mailed to his New Jersey place of employment.
4. Copy of Dean Sacco's business certificate for "Rising Sun"; billing invoices; checks received by "Rising Sun" from Glenwood Office Furniture.
5. Copy of Frontier telephone records for telephone of Linda O'Connor 607-336-7075.
6. Copy of T-Mobile telephone records for telephone of Dean Sacco 908-906-7917.

Very truly yours,

GLENN T. SUDDABY
United States Attorney

A handwritten signature in black ink, appearing to read "M. Lovric", written over the typed name of the Assistant U.S. Attorney.

BY: Miroslav Lovric
Assistant U.S. Attorney

cc: United States District Court [For Filing w/o discovery materials/enclosures]

CERTIFICATE OF SERVICE FOR ELECTRONIC CASE FILING SYSTEM

I hereby certify that on March 10, 2008, I electronically filed with the NDNY Clerk of the District Court using the CM/ECF system the above-referenced document(s) in connection with the above-referenced case. The CM/ECF system automatically sent electronic notifications of such filing to the attorneys of record in this case, as maintained by the District Court Clerk's Office, AND who are properly registered in the CM/ECF system for the NDNY as required pursuant to NDNY General Order #22. As for any attorney of record in this case who is not registered in the CM/ECF system for the NDNY, the government has caused to be mailed or faxed to that attorney either the actual CM/ECF electronic notification/e-mail as received from the CM/ECF system by the government and/or the actual documents being filed. Therefore, the non-registered attorney(s) will receive the same electronic ECF notice with the same information as will the attorney(s) who is/are registered in the CM/ECF system.

A handwritten signature in black ink, appearing to read "Miroslav Lovric", written over a horizontal line.

Miroslav Lovric
Assistant U.S. Attorney